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District of Hawaii

FILED IN THE
UNITED STATES DISTRICT COURT
DISTRICT OF HAWAII

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JUN 21 2000

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at 11 o'clock and 35 min. AM
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Attorneys for Plaintiff
UNITED STATES OF AMERICA

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

CR00-00257 HG

UNITED STATES OF AMERICA,)	CR. NO. _____
)	
Plaintiff,)	INDICTMENT
)	[18 U.S.C. §§ 371, 471,
vs.)	and 472]
)	
MYRON MOON,	(01))	
INGA BERTELMANN,	(02))	
DONNA LUNG,	(03))	
DELORES ISHII,	(04))	
ERIC FRANCISCO APILANDO,	(05))	
ELIZABETH AH TOON,	(06))	
RANDY MANUWA,	(07))	
SANDRA HASHIGUCHI,	(08))	
DENNIS YAMAUCHI,	(09))	
)	
Defendants.)	
)	

INDICTMENT

COUNT 1

The Grand Jury charges that:

Between on or about September 4, 1997, and continuing
to on or about March 5, 1998, in the District of Hawaii, the

Defendants, MYRON MOON, INGA BERTELMANN, DONNA LUNG, DELORES ISHII, ELIZABETH AH TOON, ERIC APILANDO, RANDY MANUWA, and SANDRA HASHIGUCHI, and others known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate, and agree together and with each other, to commit offenses against the United States, namely, with intent to defraud, to falsely make, forge, and counterfeit, an obligation of the United States, and with intent to defraud, to pass, utter, and keep in possession and conceal falsely made, forged and counterfeited obligations of the United States, in violation of Title 18, United States Code, Sections 471 and 472.

OVERT ACTS

In furtherance of the conspiracy and to effect the object of the conspiracy, the following overt acts, among others, were committed in District of Hawaii and elsewhere:

1. Between on or before September 4, 1997, and continuing to on or about March 5, 1998, Defendant Inga Bertelmann did knowingly allow Defendant Myron Moon to use her home computer and printer to make counterfeit U.S. notes for himself and others;

2. On or about September 4, 1997, Defendants Inga Bertelmann and Donna Lung did knowingly pass a counterfeited U.S. twenty dollar note, previously made by Defendant Myron Moon, at a Texaco Service Station, located in Kaneohe, Hawaii;

3. On or about November 3, 1997, Defendant Delores Ishii did knowingly pass two counterfeited U.S. twenty dollar notes, previously made by Defendant Myron Moon, at Nanko Fishing Supply Store, located in Kaneohe, Hawaii;

4. On or about March 4, 1998, Defendants Defendants Inga Bertelmann and Donna Lung did knowingly pass three counterfeited U.S. twenty dollar notes, previously made by Defendant Myron Moon, at Kaneohe Bay Market, located in Kaneohe, Hawaii;

5. On or about March 5, 1998, Defendants Defendants Inga Bertelmann and Donna Lung did knowingly pass one counterfeit U.S. twenty dollar note, previously made by Defendant Myron Moon, at the Windward Mall J.C. Pennys Store,, located in Kaneohe, Hawaii;

6. On or about March 5, 1998, Defendants Defendants Eric Francisco Apilando and Elizabeth Ah Toon, did knowingly attempt to pass two counterfeited U.S. twenty dollar notes, previously made by Defendant Myron Moon, at the YWCA, located in Kaneohe, Hawaii;

7. Between May 1, 1998 and August 31, 1998, Defendant Myron Moon did use Defendant Inga Bertelmann's home, computer and printer to make counterfeit U.S. notes for Defendant Randy Manuwa;

8. Between May 1, 1998 and August 31, 1998, Defendant Sandra Hashiguchi transported counterfeit U.S. notes, previously made by Defendant Myron Moon, to Defendant Randy Manuwa;

All in violation of Title 18, United States Code, Section 371.

COUNT 2

The Grand Jury further charges that:

From on or about September 4, 1997, and continuing to on or about March 5, 1998, in the District of Hawaii, MYRON MOON and INGA BERTTELMANN, Defendants herein, with intent to defraud, did falsely make, forge and counterfeit, obligations of the United States, namely, twenty dollar counterfeit U.S. notes.

All in violation of Title 18, United States Code, Section 471.

COUNT 3

The Grand Jury further charges that:

Or about September 4, 1997, in the District of Hawaii, INGA BERTTELMANN and DONNA LUNG, Defendants herein, with intent to defraud, did pass and utter, a falsely made obligation of the United States, namely, one twenty dollar counterfeit U.S. note, to the Texaco Service Station, in Kaneohe, Hawaii, which they then knew to be falsely made and counterfeited.

All in violation of Title 18, United States Code, Section 472.

COUNT 4

The Grand Jury further charges that:

Or about November 3, 1997, in the District of Hawaii, DELORES ISHII, Defendant herein, with intent to defraud, did pass and utter, falsely made obligations of the United States, namely, two twenty dollar counterfeit U.S. notes, to Nanko Fishing Supply Store, in Kaneohe, Hawaii, which she then knew to be falsely made and counterfeited.

All in violation of Title 18, United States Code, Section 472.

COUNT 5

The Grand Jury further charges that:

Or about March 4, 1998, in the District of Hawaii, INGA BERTTELMANN and DONNA LUNG, Defendants herein, with intent to defraud, did pass and utter, falsely made obligations of the United States, namely, three twenty dollar counterfeit U.S. notes, to Kaneohe Bay Drive Market, in Kaneohe, Hawaii, which they then knew to be falsely made and counterfeited.

All in violation of Title 18, United States Code, Section 472.

COUNT 6

The Grand Jury further charges that:

Or about March 5, 1998, in the District of Hawaii, INGA BERTTELMANN and DONNA LUNG, Defendants herein, with intent to

defraud, did pass and utter, a falsely made obligation of the United States, namely, one twenty dollar counterfeit U.S. note, to Windward Mall Pennys Store, in Kaneohe, Hawaii, which they then knew to be falsely made and counterfeited.

All in violation of Title 18, United States Code, Section 472.

COUNT 7

The Grand Jury further charges that:

Or about March 5, 1998, in the District of Hawaii, ERIC FRANCISCO APILANDO and ELIZABETH AH TOON, Defendants herein, with intent to defraud, did attempt to pass and utter, falsely made obligations of the United States, namely, two twenty dollar counterfeit U.S. notes, to Kaneohe YWCA, in Kaneohe, Hawaii, which they then knew to be falsely made and counterfeited.

All in violation of Title 18, United States Code, Section 472.

COUNT 8

.....The Grand Jury further charges that:.....

Between or about May 1, 1998, and on or about August 31, 1998, in the District of Hawaii, SANDRA HASHIGUCHI and RANDY MANUWA, Defendants herein, with intent to defraud, did possess and conceal, falsely made obligations of the United States, namely, counterfeit U.S. notes, which they then knew to be falsely made and counterfeited.

All in violation of Title 18, United States Code, Section 472.

COUNT 9

The Grand Jury further charges that:

On or about July 14, 1998, in the District of Hawaii, MYRON MOON and DENNIS YAMAUCHI, Defendants herein, within intent to defraud, did pass and utter, a falsely made obligation of the United States, namely, one twenty dollar counterfeit U.S. note, to Taco Bell, in Kaneohe, Hawaii, which they then knew to be falsely made and counterfeited.

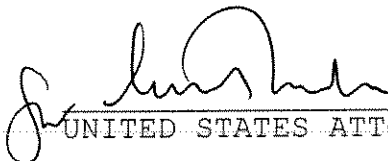
All in violation of Title 18, United States Code, Section 472.

DATED: June 21, 2000, at Honolulu, Hawaii.

A TRUE BILL

15/

FOREPERSON, GRAND JURY



UNITED STATES ATTORNEY



FIRST ASSISTANT U.S. ATTORNEY



ASSISTANT U.S. ATTORNEY

United States v. Myron Moon, et al.,
Cr. No. 00-_____; Indictment